

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KEVIN BONNER,

Plaintiff,

v.

NORMANDY PARK, a municipal
corporation; and DETECTIVE JOHN
LIEVERO, in his individual capacity,

Defendants.

No. C07-0962 RSM

PLAINTIFF'S STIPULATION
REGARDING EMOTIONAL
DISTRESS DAMAGES

I. STIPULATION

1. Plaintiff will amend his Initial Disclosures to remove Dr. Slightam (psychiatrist) and Counselor Armstrong (M.S.W.) as potential Plaintiff witnesses; Dr. Olsen (M.D.) is maintained as a treating physician regarding alleged physical injuries;

2. Plaintiff will amend his discovery responses to withdraw allegations of Post Traumatic Stress Disorder;

3. Plaintiff withdraws from the jury's consideration any allegation of the need for prescription medication for emotional distress;

4. Plaintiff *maintains* his allegations of "garden variety emotional distress damages;"

5. Plaintiff will not call an expert witness at trial to address emotional distress damages;

6. Plaintiff will not claim medical expenses for psychological counseling or mental health treatment at trial;

7. Plaintiff will not claim medical expenses for prescription medication for mental health treatment at trial; and

8. Plaintiff will not claim to have suffered a psychiatric injury as a result of the April 25, 2005 incident with Normandy Park Police Department.

DATED this 14th day of December, 2007.

Stipulation entered by:

LAW OFFICES OF JEFFREY NEEDLE

Jeffrey Needle, WSBA # 6346
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Stipulation acknowledged and approved as to form only:

KEATING, BUCKLIN & MCCORMACK, INC., P.S.

Brenda L. Bannon, WSBA 17962
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DECLARATION OF SERVICE

I hereby certify that on December 21, 2007, I electronically filed PLAINTIFF'S STIPULATION REGARDING EMOTIONAL DISTRESS DAMAGES with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Jeffery Needle
Attorney at Law
119 First Ave. S., #200
Seattle, WA 98104

s/Christine Jensen Linder
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